

REMARKS

Applicant respectfully requests reconsideration of the present application in view of the reasons that follow.

Claims 1-12 were rejected under 35 USC 102 (e) as being anticipated by Marshall et al. This rejection is respectfully traversed and reconsideration thereof is requested.

Note at the outset that applicants' claim a "group composition store." Such a store has a very specific meaning, i.e., that the compositions and the content they reference are available to a specified group and are unified by the independent user profiles. Applicants' specification recites as follows:

"Note that multiple users in a group (each with their own personal imaging repository) can refer to the same imaging information using shared services, i.e., a group composition store, as noted above. Part of each user's personal imaging repository, in this scenario, can be shared by a group having a common association, such as a group project." See paragraph 63.

"The group composition store 500 includes a plurality of compositions that each references a graphic in the group graphics store for ease of illustration. There is no requirement that a composition in the group composition store reference a graphic in the group graphics store. It could reference a graphic anywhere." See paragraph 142.

"There can be several group composition stores available for different groups. For each group composition store that the user accesses, there will be a reference to that group composition store in one of that user's profiles. Note that a reference to a particular group composition store is typically added to the user's profile by the user "subscribing" to the group composition store. This might be accomplished by the user browsing to a web service, which downloads web content into the user's browser which uses an imaging extension to add a reference to that group composition store to the user's profile. This reference could later be removed by browsing to another web service that is allowed to remove references to group composition stores from the user profile. Once the reference is added to the user profile for the group

composition store, then whenever the web content enumerates all of the compositions available, the compositions contained within the group composition store will be included (along with compositions in other composition stores associated with the user's profile, such as the default composition store)." See paragraph 144.

"Thus, whatever compositions happen to be in the group composition store are automatically available to the web content/user. For example, if the user subscribes to People Magazine (making the user a member of the "People magazine subscribers group"), a reference to the people magazine group composition store might be provided to the user's profile. This group composition store might contain issues of People magazine. As new issues come out, these new issues would be added to the People magazine group composition store. Because the user has a reference to the People magazine group composition store in his/her user profile, the new issues of people magazine (represented as compositions in the group composition store) would automatically be a part of the user's personal imaging repository. The user would be able to select them like any other composition available in the user's personal imaging repository and subsequently use them. The user would not need to explicitly choose the group composition store—once a reference thereto is added to the user's profile, it is always a part of the user's personal imaging repository and compositions from it will be enumerated when available compositions are listed for selection by the user through the web content, unless the user removes it." See paragraph 144.

"The use of a group composition store 500 and/or the group graphic store 501 is particularly advantageous for making a set of compositions available to a group of users. For example, a monthly newsletter could be added to the group composition store. This newsletter composition could then be accessed for the purpose of printing, and other manipulations. The group composition store/graphics store makes imaging information automatically available to a user based on his/her affiliation with some group. This affiliation would be indicated in the user profile for each person. Note that there could be several distinct group composition store/graphic stores for each

group with which the user is affiliated. As additional imaging information becomes available in these group composition stores, the user would automatically have that imaging information in his/her personal imaging repository because the group composition store is a part of that user's personal imaging repository, via the reference to the group composition store in the user's user profile." See paragraph 146.

Marshall et al. discloses a closed composition and profile system for creating memories products based on fulfillment only by the Hallmark system. As the examiner notes, some of the content can be taken from external source. But there is no disclosure of "group composition stores."

Likewise, there is no disclosure of a web based system where compositions can be created on a network service not associated with the Hallmark system and unified by an independent user profile that, as is required by the claim language, is "independent from and not associated with the group composition store." Note that applicant's specification also includes definitions of the graphic store, the composition store and the user profile store that clarify that they are network services. See paragraphs 26, 30, 38 and 66 of applicants' specification. The words "independent from and not associated with" for this web-based system clearly delineate that the group composition store is both networked and autonomous, meaning that the system has a protocol to mix and match diverse unrelated systems. In other words, a composite composition can be created by mixing and matching compositions from one or more unassociated and independent group composition stores, all unified by an independent user profile not associated with any of the composition stores. Thus, because of this independence of both the group composition stores and the user profiles, composite compositions can be created with any number of other independent systems and entities not restricted to the Hallmark fulfillment center with its associated user profiles and shared within a specified group.

The examiner states that the Memories Product Generation System 129A shown in Fig. 1B of Marshall et al. is a group composition store which is separate and independent from the plurality of different user profiles defined in applicants' claims. This is not the case, as is evident from the figure. First, what is disclosed in Marshall et al. is not a group composition store, i.e., a composition store that is shared by a specified set of users, based on

user profiles. Second, the Memories Product Generation System 129A can only be used in the Hallmark system and the Hallmark system user profiles. Whether or not the Hallmark fulfillment center or centers are distributed, has nothing to do with whether or not the user profiles are independent and not associated with the group composition stores. Even when the Marshall et al. disclosure discusses distributed architecture in paragraph 33, it always refers back to the same locked-in Hallmark Memories Product Generation System 129A.

The user profiles in the claim are defined to be independent from and not associated with the group composition store. That means that they can be used with any number of other systems and entities and act as the unifying entity in the process. In contrast, the user profiles in the Hallmark system are associated group composition store, i.e., the Memories Product Generation System 129A. They can be used with no other composition store. This is directly at odds with the claim language.

The claimed system is an open system that pulls together content that spans multiple systems, and permits compositions to be created and combined from multiple unrelated systems, i.e., the independent graphics store and the independent composition stores, and the system protocol for the claim as a whole allows compositions to be unified and specified by an independent user profile accessed from a user profile store network service. A fundamental point is that the compositions and the content in the claims are associated with the user and his/her identity and is shared among a group as defined by the user profiles, and spans multiple systems, rather than being associated and stored within a single closed Hallmark fulfillment system. To reiterate, multiple independent users not associated with the independent graphics stores can be given access to the same one or more graphics in the graphics store based on the fact that the graphic is referenced in one of the group composition stores and the fact that the accessed independent user profile includes a reference to one of the group composition stores that references such graphics materials.

An example of the system operation would be for a user to browse to the MAPQUEST web site and download and store a map to his/her house in a graphics store associated with the user. The user could then browse to an independent group composition store and add a reference to the map graphic in the graphics store. Other users in the group, through the unifying aspect of the user profiles, could now have shared-access to this map, even though the map is not physically stored in the group composition store and even though

the graphics store is independent of the group composition store, and even though the other users are independent of and not associated with the group composition store.

An interesting aspect of the invention is that it is possible with the claimed invention set forth in claim 6, to use a web extension to list compositions stored in the group composition store as being available to a user imaging client seamlessly with other user non-shared content. Thus, in accordance with claim 6, the map in the graphics store would seamlessly show up in the imaging clients of the various members of the group as being available along with all of their other documents. The examiner cites paragraphs 57 and 70 as disclosing this claimed feature. There is nothing in these paragraphs relating to group compositions stores or the enumeration of compositions in the group composition store that are now available.

These network effects are not disclosed or suggested by Marshall et al.

In view of the foregoing amendments and remarks, reconsideration and withdrawal of the present rejection is respectfully requested, and an early passage to issue solicited.

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

Respectfully submitted,

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